This document was submitted to EPA by a registrant in connection with EPA's evaluation of this chemical, and it is presented here exactly as submitted.

AMVAC

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June 9, 2000

Via Hand Delivery

Mr. Robert C. McNally, Chief (MC-7508W)
Special Review Branch
Special Review and Reregistration Division
United States Environmental
Protection Agency
1921 Jefferson Davis Highway
Crystal Mall 2
6th Floor
Arlington, VA 22202

Re: DDVP PRA

Dear Mr. McNally:

This letter supplements our letter dated March 17, 2000, which discussed the large existing body of literature on DDVP in the pig. We submitted the March 17, 2000, letter in response to statements by EPA staff at our February 10, 2000, meeting, that a 3-fold FQPA factor would be applied to DDVP based on the trichlorfon data in the pig and guinea pig.

We have since obtained additional studies highly relevant to this issue. Copies of these studies, and a reference list, are appended.

Our March 17, 2000, submission discussed studies that addressed the marked difference in the toxicological profiles for DDVP and trichlorfon. The studies appended to this letter substantiate the differences shown in the studies submitted and extend the findings to many different investigators, different laboratories, and different strains of animals. Several of the studies are very large. In general, the scientific literature on the developmental effects of trichlorfon and DDVP is quite extensive. This is primarily because formulations of these pesticides have been used commercially in pigs. While adverse field reports exist on effects of trichlorfon in pigs (shaky pig

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syndrome), DDVP is used commercially to improve reproductive performance in pigs ATGARD®. Because Amvac does not hold the veterinary registration for ATGARD®, the extent of the literature was not known to Amvac previously. We note in addition in this regard that EPA's use of the trichlorfon literature as the basis for the FQPA factor was only recently made known.

It should be noted that the adverse effects of trichlorfon on the offspring of pigs was noted in field studies at normal usage levels, and not at extremely high doses that are the maximally tolerated by the sows.

Amvac urges EPA to examine the enclosed data. While most of the studies have been run at doses of approximately 5 to 15 mg/kg in the pig, it would be scientifically unjustified not to use these data, which demonstrate that there are beneficial effects on pig offspring observed in many studies of DDVP at quite significant doses. A risk assessment should be based on the most relevant data, and data in this dose range clearly show beneficial effects. In contrast, it would be scientifically insupportable to use data from the Mehl paper at near lethal levels of DDVP in two animals, as this has little relevance as a basis for extrapolation of risk from doses to which humans are exposed.

Amvac urges EPA to examine this information, permit a scientific discussion of the conclusions, and revise the DDVP risk assessment accordingly. In particular, we believe the appended studies require EPA to reassess its proposed application of the 3-fold FQPA safety factor. Amvac believes the appended studies, together with the negative rat and rabbit developmental studies already accepted by EPA, as well as the studies submitted in March, support a conclusion that DDVP has no adverse developmental toxicity effects and thus that no FQPA safety factor is warranted. We look forward to discussing this with you at your earliest convenience.

Sincerely,

Ian S. Chart/ajm

Ian S. Chart
Director of Regulatory Affairs

Attachments
cc: Mr. Jack E. Housenger (w/attachments) (via hand delivery)

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